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21 Attorneys for Plaintiff

22 **UNITED STATES DISTRICT COURT**  
23 **CENTRAL DISTRICT OF CALIFORNIA**

24 ANDREA RIDGELL, on behalf of  
25 herself and others similarly situated

26 Plaintiff,

27 v.

28 FRONTIER AIRLINES, INC. a  
Colorado corporation; AIRBUS S.A.S.,  
a foreign corporation doing business in  
the State of California; AIRBUS  
GROUP HQ INC., a corporation doing  
business in the State of California  
Defendants.

**CASE NO. CV 18-4916 PA (AFMx)**  
**DECLARATION OF KILEY LYNN**  
**GROMBACHER IN SUPPORT OF**  
**RESPONSE TO PLAINTIFF TO**  
**ORDER TO SHOW CAUSE RE:**  
**DISMISSAL FOR LACK OF**  
**PROSECUTION**

## **DECLARATION OF KILEY L. GROMBACHER**

I, Kiley Lynn Grombacher, declare as follows:

1. I am an attorney duly admitted to practice law before this Court and I am a member in good standing of the State Bar of California, the State Bar of Tennessee, and in the Third and Ninth Circuits.

2. I am a named partner at Bradley/Grombacher, LLP counsel for Andrea Ridgell (“Plaintiff”).

3. In my capacity as counsel, I have been actively involved with all aspects of this litigation. Accordingly, I have personal knowledge of all the matters set forth herein, and if called, I could and would competently testify to the following:

4. I submit this declaration in support of the Response of Plaintiff to the Order to Show Cause Re: Dismissal for Lack of Prosecution.

5. Plaintiff filed this action on June 1, 2018.

6. Given that defendant Airbus S.A.S. (“Airbus”) is a foreign corporation, service must be effectuated through protocols established by the Hauge Convention.

7. Shortly after filing, Plaintiff caused the complaint and all initiating documents to be translated into French.

8. Promptly upon translation, Plaintiff began the process of effectuating service under the Hague Convention with the assistance of ABC Legal Services, Inc. (“ABC Legal”), a process serving company.

9. On or about July 12, 2018, ABC Legal caused a service request along with French translations of the following case-related documents to be transmitted via Federal Express to the Ministry de la Justice in Paris: Complaint, Summons, Notice of Assignment, Standing Order, Notice to Parties of Court-Directed ADR, and Certificate of Interested Parties.

10. The service request was received by the Ministry de la Justice in Paris on July 16, 2018, FedEx confirmation 772692515080.

11. Our office has corresponded with Rick Hamilton, Director of International Service at ABC Legal and been informed that their office has not yet received the proof of service from the Ministry de la Justice in Paris. Upon receipt, ABC Legal will cause the proof to be translated into English and will provide the translated proof to our office for filing with the Court.

12. We have been informed that Mr. Hamilton has followed up with his contact at the Ministry de la Justice in Paris but we do not yet have an estimate of when service will be completed.

13. Given the time delay, Plaintiff is exploring other potential mechanisms for service.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and is based upon my own personal knowledge. Executed in Westlake Village, California on 4<sup>th</sup> February, 2019.

/s/Kiley Lynn Grombacher

## Kiley Lynn Grombacher